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August 17, 2021

# **BY ECF**

Hon. Analisa Torres United States District Judge U.S. District Court Southern District of New York 500 Pearl St., Courtroom 15D New York, NY 10007

Re: Shack Enterprises, Inc. v. Aristotle Hatzigeorgiou

Case No. 1:21-cv-05448 (AT)(OTW)

Dear Judge Torres:

We represent Plaintiff Shack Enterprises, Inc. in the above-captioned matter. We write pursuant to Rule I.C of Your Honor's Individual Practices to respectfully request an extension of the August 20, 2021 deadline to submit the joint letter, proposed case management plan and scheduling order, as described in the Initial Pretrial Scheduling Order dated July 12, 2021 (ECF 9).

Good cause exists for this request. On July 23, 2021, the Defendant, through counsel, agreed to waive service of the summons and we are currently awaiting receipt of the signed waiver form. Accordingly, we respectfully request that the August 20 deadline be extended to 14 days from the filing of Defendant's answer. This is the Plaintiff's first request for such an extension.

Respectfully submitted,

/s/Joshua S. Wolkoff

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